



April 22, 2022

VIA ECF

Honorable Vernon S. Broderick
United States District Judge
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

Re: *Ronald Cerrato Galan v. Style Management Co., Inc., et al.*
Docket No.: 22-cv-01137 (VSB)

Dear Judge Broderick:

This firm represents the Plaintiff Ronald Cerrato Galan, in the above-referenced matter, against Defendants Style Management Co., Inc., Andrew Rosenberg and Stefanie Rosenberg, his former employers, for alleged violations of the Fair Labor Standards Act and New York Labor Law. This action was commenced on February 9, 2022. Following service of process, Defendant Style Management Co., Inc.'s time to file an Answer or a responsive motion expired on March 17, 2022 and Defendants Andrew Rosenberg's and Stefanie Rosenberg's time to file an Answer or a responsive motion expired on March 28, 2022. On April 6, 2022, the Court entered an Order directing Plaintiff to file his motion for a default judgment on or before April 27, 2022. D.E. 9. Plaintiff now writes to request a brief extension of time to serve his motion for a default judgment.

Specifically, Defendant Style Management Co., Inc. was served through the New York Secretary of State. D.E. 6. During the period of the pandemic, as well as during recent months, counsel for multiple Defendants in other matters have reported that the New York Secretary of State has forwarded Summons and Complaints more slowly than their past practices. As a result, Defendants in other matters have reported receiving the Summons and Complaint much later and were unable to timely respond. While this Firm cannot determine if that occurred here, this Firm has taken steps to avoid this risk. Following Your Honor's Order, Plaintiff sent an additional courtesy copies of the Summons and Complaint and the respective Affidavits of Service to Defendant Style Management Co., Inc., as well as Defendants Andrew Rosenberg and Stefanie Rosenberg, to notify them regarding the lawsuit and that Plaintiff will soon commence proceedings to obtain a default judgment against them. In the event that Defendants Style Management Co., Inc. is learning about this lawsuit for the first time or only recently received notice from the New York Secretary of State, its owners will need time to obtain counsel and appear in this action. In light of the multiple recent religious holidays and vacation schedules of many attorneys surrounding spring break schedules (April 15, 2022 through April 22, 2022 in New York City, among others), retaining counsel may take some additional time.

Separately, Plaintiff's counsel is currently experiencing an unusually active litigation calendar, including deadlines to serve four substantive motions in multiple matters between April 25, 2022 and April 27, 2022, as well as other discovery deadlines and a Court appearance. As such, Plaintiff requires additional time to complete preparation of Plaintiff's motion for a default judgment and to meet with Plaintiff to confer regarding and to execute a declaration in support of Plaintiff's his motion for a default judgment. Because Plaintiff does not reside locally to this Firm's Hauppauge, New York office, this meeting also requires additional time to occur.

Accordingly, Plaintiff respectfully requests that his time to serve his motion for a default judgment be extended from April 27, 2022 until May 12, 2022. This is Plaintiff's first request for the relief sought herein.

We thank the Court for its kind consideration of this request.

Respectfully submitted,



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